

Exhibit 6

Jacqueline Moline, M.D.

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MISSOURI CIRCUIT COURT
TWENTY-SECOND JUDICIAL CIRCUIT
ST. LOUIS CITY
TRACEY YVETTE YOUNG, et al.,

Plaintiff,
vs. Case No. 1522-CC09728-02

JOHNSON & JOHNSON; JOHNSON & JOHNSON
CONSUMER COMPANIES, INC.; AND IMERYS
TALC AMERICA, INC., F/K/A LUZENAC
AMERICA, INC.,

Defendants

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VIDEOTAPED DEPOSITION OF
JACQUELINE MOLINE, MD
Great Neck, New York
Wednesday, January 30, 2019

Reported by:

Angela M. Shaw-Crockett, CCR, CRR, RMR, CSR

Jacqueline Moline, M.D.

<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>January 30, 2019 9:14 a.m.</p> <p>VIDEOTAPED DEPOSITION of JACQUELINE MOLINE, MD, held at Northwell Medical, 175 Community Drive, Great Neck, New York, before Angela M. Shaw-Crockett, a Certified Court Reporter, Certified Realtime Reporter, Registered Merit Reporter and Notary Public of the States of New York, New Jersey and Connecticut.</p>	<p>Page 2</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>PROCEEDINGS</p> <p>THE VIDEOGRAPHER: Good morning. We're on the record. My name is Chris Martin. I'm the videographer here for Golkow Litigation Services. Today's date is January 30, 2019, and the time is 10:18 a.m. This deposition is being held at Northwell Medical, 175 Community Drive, Great Neck, New York. The caption on this case is Tracey Yvette Young, et al., versus Johnson & Johnson, et al., Case No. 1522-CC09728-02, filed in the Circuit Court of the City of St. Louis, State of Missouri. The deponent is Dr. Jacqueline Moline.</p> <p>At this time, would counsel please introduce themselves for the record?</p> <p>MR. CABRAL: Colin Cabral on behalf of plaintiff Johnson & Johnson --</p> <p>MS. FRIEDMAN: Defendant.</p> <p>MR. CABRAL: Sorry. My apologies -- on behalf of defendant Johnson & Johnson, from Proskauer Rose. With me is my colleague Amelia Friedman.</p> <p>MS. BOCKUS: Jane Bockus on behalf of Imerys.</p> <p>MR. SULLIVAN: Ryan Sullivan on behalf of</p>
<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>APPEARANCES:</p> <p>FOR THE PLAINTIFFS:</p> <p>The Lanier Law Firm, P.C. 10866 Wilshire Boulevard #400 Los Angeles, California 90024</p> <p>BY: LEE A. CIRSCH, ESQ. 310-277-5100 Lee.cirsch@lanierlawfirm.com</p> <p>FOR DEFENDANT JOHNSON & JOHNSON</p> <p>Proskauer Rose LLP 2029 Century Park East Suite 2400 Los Angeles, California 90067-3010</p> <p>BY: COLIN G. CABRAL, ESQ. AMELIA FRIEDMAN, ESQ. 310-284-5611 ccabral@proskauer.com</p> <p>FOR DEFENDANT IMERYS TALC AMERICA, INC. f/k/a LUZENAC AMERICAN, INC.:</p> <p>Dykema Gossett PLLC 112 East Pecan Street Suite 1800 San Antonio, Texas 78205</p> <p>BY: JANE BOCKUS, ESQ. RYAN J. SULLIVAN, ESQ. 210-554-5226 rsullivan@dykema.com</p> <p>ALSO PRESENT: Chris Martin, The Videographer</p> <p>** ** **</p>	<p>Page 3</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Page 5</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Imerys.</p> <p>MR. CIRSCH: Lee Cirsch on behalf of the Young plaintiffs.</p> <p>THE VIDEOGRAPHER: And at this time, the court reporter, Angie Shaw-Crockett, will swear in the witness.</p> <p>D R J A C Q U E L I N E M O L I N E, called as a witness, having been first duly sworn, was examined and testified as follows:</p> <p>EXAMINATION</p> <p>BY MR. CABRAL:</p> <p>Q. Good morning, Dr. Moline.</p> <p>A. Good morning.</p> <p>Q. You've been deposed before, correct?</p> <p>A. Yes.</p> <p>Q. How many times?</p> <p>A. A lot.</p> <p>Q. Do you have --</p> <p>A. I haven't counted, but it's many times.</p> <p>Q. What is your best estimate of how many times you've been deposed?</p> <p>A. It's -- it's -- I'm deposed, it seems like, about once a month lately, for the past couple of years. So -- and probably, all totaled, a hundred times or more. I don't know. I try to -- I</p>

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<p>1 Q. Has all of your testimony in asbestos 2 cases been on behalf of plaintiffs? 3 A. Testimony, yes. 4 Q. How much money have you made testifying on 5 behalf of plaintiffs in asbestos cases, if you know? 6 A. I have not added up the amount of money 7 I've made. 8 Q. What is your best estimate of how much 9 money you've made testifying on behalf of plaintiffs 10 in asbestos cases? 11 A. I would not be able to give you an 12 accurate estimate. It's varied widely year over 13 year. 14 Q. You testified at a trial in St. Louis last 15 year in a case called Ingham. 16 A. Yes. 17 Q. Do you recall that? 18 THE COURT REPORTER: In a case called? 19 MR. CABRAL: Ingham, I-N-G-H-A-M. 20 BY MR. CABRAL: 21 Q. Do you recall testifying, in that case, 22 that you've made over \$3 million testifying on 23 behalf of plaintiffs in asbestos cases? 24 MR. CIRSCH: Object to form. 25 A. I don't specifically remember testifying</p>	<p>1 a few months away, and I will, in all likelihood, 2 get an extension, so I will not have any idea until 3 October. 4 Q. Do you know if it's over a million 5 dollars? 6 A. It is definitely not over a million 7 dollars. 8 Q. Do you know if it's over a hundred 9 thousand? 10 A. It is most likely over a hundred thousand. 11 Q. Is it over 500,000? 12 A. I do not know. 13 Q. You have testified for The Lanier Law Firm 14 before, correct? 15 A. Yes. 16 Q. How many times have you testified for the 17 Lanier firm? 18 A. Do you mean in deposition or in trial? 19 Q. We'll start with depositions. 20 A. In depositions, probably five to eight 21 times. 22 Q. How many times have you testified at a 23 trial on behalf of the Lanier firm? 24 A. Definitely one time in June. And I don't 25 know if I've ever testified any other time.</p>
<p>1 to that, but that -- I don't dispute that number. 2 BY MR. CABRAL: 3 Q. You don't dispute that -- 4 A. That that's possible. That -- that if I 5 were to add it up, in all likelihood, over 20 years, 6 that that's an accurate number. 7 Q. I got it. I just -- the question was cut 8 off, so let me just start over, if that's okay. 9 You don't dispute that it's possible 10 you've made over \$3 million testifying on behalf of 11 plaintiffs in asbestos cases? 12 A. I do not -- 13 MR. CIRSCH: Object to form. 14 A. I do not dispute that. 15 BY MR. CABRAL: 16 Q. Do you know how much you have -- let me 17 start over. 18 Do you know how much you earned testifying 19 as an expert witness in 2018? 20 A. I do not. 21 Q. Do you have any estimate? 22 A. No. 23 Q. You have no idea how much you made 24 testifying as an expert last year? 25 A. I haven't gotten my 1099s, and tax day is</p>	<p>1 Q. Do you recall when it was the first time 2 that you worked with the Lanier firm? 3 A. It was several years ago. I don't 4 remember the exact year. 5 Q. What is your best recollection of the year 6 in which you started working with the Lanier firm? 7 A. I honestly don't know. I don't know -- 8 it's been several years. Maybe 2010. 9 Q. Is it accurate that you've worked with 10 Lanier firm on about five to eight cases total? 11 MR. CIRSCH: Object to form. 12 A. No, you asked me how many times I've 13 testified in deposition -- 14 BY MR. CABRAL: 15 Q. Right. 16 A. -- or testified. I know that I've 17 reviewed a few cases a year. Sometimes two or 18 three, for several years. Many of those don't 19 result in testimony. 20 Q. Got it. 21 So how many cases would you say you have 22 worked with the Lanier firm? 23 MR. CIRSCH: Object to form. 24 A. Again, you know, I can't -- it's -- it's 25 probably about -- probably about five cases a year</p>

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1 INDEX			1		
2 EXAMINATION BY WITNESS			2 CERTIFICATE		
3 MR. CABRAL Dr. Jacqueline Moline			3		
4 MR. BOCKUS Dr. Jacqueline Moline			4 STATE OF NEW YORK)		
5 EXHIBITS			5 : ss		
6 FOR ID DESCRIPTION PAGE			6 I, Angela M. Shaw-Crockett, a Certified Court		
7 Exhibit 1 294 articles on current reliance list/ 52			7 Reporter, Certified Realtime Reporter, Registered Merit		
8 current reference list			8 Reporter and Notary Public within and for the States of New		
9 Exhibit 2 Excerpt for a monograph 55			9 York, New Jersey and Connecticut, do hereby certify:		
10 Exhibit 3 Paper entitled "Cancer Mortality Among Women 67			10 That JACQUELINE MOLINE, MD, the witness whose		
in the Russian Printing Industry"			11 deposition is herein before set forth, was duly sworn by me		
11 Exhibit 4 Magnani study that's cited by IARC 81			12 and that such deposition is a true record of the testimony		
12 Exhibit 5 Article by Berry from the year 2000 92			13 given by such witness.		
13 Exhibit 6 Paper titled "Cohort Mortality Study of 102			14 I further certify that I am not related to any of		
14 Women Compensated for Asbestosis in Italy"			15 the parties to this action by blood or marriage and that I		
15 Exhibit 7 Document titled "Does Exposure to Asbestos 109			16 am in no way interested in the outcome of this matter.		
16 Cause Ovarian Cancer? A Systematic			17 In witness whereof, I have hereunto set my hand		
17 Literature Review and Meta-analysis"			18 this 1st day of February, 2019.		
18 Exhibit 8 Document titled "Gynecologic and Breast 121			19		
19 Cancers in Women After Exposure to Blue			20		
20 Asbestos at Wittenoom," dated			21 ANGELA M. SHAW-CROCKETT, CCR, CRR, RMR, CSR		
21 January 29, 2009			22 LICENSE NO. XI00218400		
22			23		
23			24		
24			25		
25					
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1 EXHIBITS (CONT'D)			1 -----		
2 FOR ID DESCRIPTION PAGE			2 E R R A T A		
3 Exhibit 10 Paper titled, "Mortality of two groups of 133			3 -----		
4 women who manufactured gas masks from			4 PAGE LINE CHANGE		
5 chrysotile and crocidolite asbestos:			5 REASON: _____		
6 As a 40-year follow-up"			6 _____		
7 Exhibit 11 Paper titled, "Cancer Mortality and 137			7 REASON: _____		
8 Incidence of Mesothelioma in a Cohort of			8 _____		
9 Wives of Asbestos Workers in Casale			9 REASON: _____		
10 Monferrato, Italy" dated October 2007			10 _____		
11 Exhibit 12 Paper titled, "Ovarian cancer and 152			11 REASON: _____		
12 occupational exposure among pulp and			12 _____		
13 paper employees in Norway," and the lead			13 REASON: _____		
14 author is Langseth and the paper is			14 _____		
15 dated 2004			15 REASON: _____		
16 Exhibit 13 Paper titled, "Asbestos fibers in ovarian 152			16 _____		
17 tissue from Norwegian pulp and paper			17 REASON: _____		
18 workers," also authored by Langseth,			18 _____		
19 dated 2007			19 REASON: _____		
20 Exhibit 14 Presentation titled "Asbestos and Ovarian 179			20 _____		
21 Cancer," dated November 2016			21 REASON: _____		
22 Exhibit 15 Excerpt from the IARC monograph relating 195			22 _____		
23 to talc			23 REASON: _____		
24 Exhibit 16 The Gordon 2014 paper 206			24 _____		
25 (Exhibits retained by the court reporter.)			25 REASON: _____		

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